

# HAYNES BOONE



**Joseph Lawlor, Esq.**

Direct Phone Number: 212-659-4985

Direct Fax Number: 212-884-9574

*joseph.lawlor@haynesboone.com*

January 28, 2022

*Via ECF*

Honorable Debra C. Freeman  
United States District Court  
Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

***Re: Contreras v. Warner Bros. Entertainment Inc., Case No. 21-cv-9205***

Dear Judge Freeman:

We are counsel to Defendant Warner Bros. Entertainment Inc., in the above-captioned action. We write with Plaintiff's consent pursuant to Rule I(B) of Your Honor's Individual Practices to respectfully request an extension of Defendant's time to respond to the Complaint (Doc. No. 1), filed by Plaintiff Yensy Contreras, from February 3, 2022 to and including February 17, 2022.

The parties are continuing to engage in advanced settlement discussions with an aim to resolve this matter without Court intervention, including, but not limited to, a call scheduled for February 1. We request this extension to direct our resources at settlement negotiations, which would be disrupted by a responsive pleading. This is Defendant's fourth request for the relief sought and it will affect the initial pretrial conference currently scheduled for February 2, 2022. We request an equal adjournment of the conference date to February 16, 2022, respectively.

We thank the Court for its attention to this matter.

Respectfully submitted,

*s/Joseph Lawlor/*

Joseph Lawlor

cc: Counsel of record (via ECF)